



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey*

970 Broad Street, 7<sup>th</sup> floor  
Newark, New Jersey 07102

973-645-2700

September 29, 2020

The Honorable Claire C. Cecchi  
United States District Judge  
Martin Luther King Jr. Federal Building and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: *United States v. Matthew Goettsche, et al.*,  
Crim. No. 19-877

Your Honor:

Pursuant to the current Scheduling Order in this matter, the Government is required to produce to defense counsel “non-filtered records that were produced by Apple in response to search warrants that presented technical difficulties” (the “Apple Records”) by September 30, 2020. Dkt 117. The Government is prepared to make a substantial production of the Apple Records on September 30. However, due to technical issues that have been exacerbated by the processing of these records during the COVID-19 pandemic, the Government is requesting that the deadline to produce the entirety of the Apple Records be extended to October 21, 2020. The Government has conferred with defense counsel, who have consented to this request.

Respectfully submitted,

CRAIG CARPENITO  
United States Attorney

A handwritten signature in blue ink, appearing to read "Anthony Torntore".

By: Anthony P. Torntore  
Jamie L. Hoxie  
Assistant U.S. Attorneys